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May 11, 2006

VIA E-MAIL

Donald J. Savery, Esq.
Bingham McCutchen LLP
150 Federal Street
Boston, MA 02110-1726

Re: *In re Biopure Securities Litigation*, C.A. No. 03-12628 (NG)

Dear Don:

I write to inform you as to the deposition availability of the Plaintiffs. Plaintiff Ronald Erickson is available for a deposition in Boston, at your offices or my offices, on May 31, 2006, beginning at 1 p.m. The deposition can continue as long as necessary, up to the seven hour limit imposed by Rule 30(d)(2) F.R. Civ.P. Plaintiff John Esposito, Jr. is available for a deposition on June 7, 2006, beginning at 10:00 a.m., at Bingham McCutchen's offices in New York City. I will follow up with you shortly with regards to the availability of Plaintiff Stuart Gottlieb for a deposition in the Miami area.

As you will note, the depositions of each Plaintiff will be held where he resides or works. Of course, we will agree to a similar accommodation with respect to the depositions of each of the individual Defendants.

Sincerely,

/s/ Edward F. Haber

Edward F. Haber

cc: Howard Longman, Esq.
Christopher F. Robertson, Esq.
Cathy A. Fleming, Esq.
Edward P. Leibensperger, Esq.
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